

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)

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In re: OUTSIDEWALL TIRE  
LITIGATION

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) Civil Action Nos. 1:09cv1217 (TSE/IDD)  
) 1:09cv1218  
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**DEFENDANTS' MOTION TO POSTPONE HEARING ON MOTIONS TO DISMISS**  
**SUBJECT TO PENDING MOTIONS TO DISMISS**

Subject to their pending motions to dismiss pursuant to Fed. R. Civ. P. 12, Defendants Al Dobowi Ltd., Al Dobowi Tyres Co. LLC, and Al Dobowi Group (collectively, "Al Dobowi"), and Shandong Linglong Rubber Co., Ltd. ("Linglong Rubber"), by counsel, respectfully request that the Court postpone the hearing on Defendants' Motions to Dismiss, which is currently scheduled for February 12, 2009, to the Court's docket for next Friday, February 19, at 10:00 am. Plaintiffs consent to this motion.

Lead counsel for Al Dobowi, John Barr, who will be arguing Al Dobowi's Motions to Dismiss, works and is located in Houston. Mr. Barr has been admitted *pro hac vice* in the Al Dobowi action. Lead counsel for Linglong Rubber, Francessa Morris, who will be arguing Linglong Rubber's Motions to Dismiss works and is located in New York. Ms. Morris has been admitted *pro hac vice* in the Linglong Rubber action.

Al Dobowi's lead counsel in Houston have made travel arrangements to fly to Reagan National Airport on Thursday, February 11, 2009, in advance of Friday morning's hearing. As of the time of this filing, they have been informed by Continental Airlines that the inclement weather in the D.C. area will impact their flight. Therefore, it is uncertain that Al Dobowi's lead counsel will be able to get to the area in time to argue Al Dobowi's motions on Friday. Al Dobowi's local counsel, Shelby Kelley, is also currently in Texas and may not be able to get

back to Virginia in time for the hearing due to the weather.

Linglong Rubber's lead counsel has made travel arrangements to arrive by train in D.C. on Thursday, February 11, 2009, in advance of Friday morning's hearing. Given the current weather in New York and the D.C. area, there also is concern about her ability to arrive in the area in advance of Friday's hearing on Linglong Rubber's motions.

In light of the foregoing, Al Dobowi and Linglong Rubber believe good cause exists to postpone the hearing on Defendants' Motions to Dismiss, which is currently scheduled for February 12, 2010 at 10:00 am. Accordingly, subject to and without waiver of their pending motions to dismiss, Defendants respectfully request that the Court grant this motion and postpone the hearing on Defendants' Motions to Dismiss to the Court's docket for next Friday, February 19, at 10:00 am.

Dated: February 10, 2010

/s/

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**CERTIFICATE OF SERVICE**

I certify that I have this day caused a true and accurate copy of the foregoing document to be delivered to the following persons via electronic filing:

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